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8 UNITED STATES BANKRUPTCY COURT  
9 NORTHERN DISTRICT OF CALIFORNIA - OAKLAND DIVISION

10 In re: ) Case No. 13-46340-WJL-13  
11 )  
12 **JOHN D. FLORES,** ) Chapter 13  
13 )  
14 Debtor. ) **NOTICE OF MOTION FOR CONTEMPT**  
15 ) **AND DAMAGES AGAINST RAZOR**  
16 ) **CAPITAL, LLC**  
17 )  
18 ) Date: August 26, 2015  
19 ) Time: 10:30 a.m.  
20 ) Courtroom: 220  
21 ) Judge: The Honorable William Lafferty  
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29 **TO: RAZOR CAPITAL, LLC, THE UNITED STATES TRUSTEE, CHAPTER 13**  
30 **TRUSTEE MARTHA BRONITSKY, AND THIS HONORABLE COURT**

31 Please take Notice that a hearing will be held on **August 26, 2015**, at **10:30 a.m.**, at  
32 1300 Clay St., Suite 300, Oakland, California 94612, Courtroom 220 on the motion of **John**  
33 **Flores (“Debtor”)** against **Razor Capital, LLC (“Razor”)** for Contempt and Damages for  
34 violations of the Bankruptcy Automatic Stay (11 U.S.C. § 362), violations of the Bankruptcy  
35 Stay of Action Against Codebtor (11 U.S.C. § 1301), and Contempt of Court under 11 U.S.C. §  
36 105.

37 The Motion is based upon:

- 38 1. this **Notice of the Motion**;

2. the **Motion For Contempt And Damages Against Razor Capital, LLC;**
3. the **Memorandum Of Points And Authorities In Support Of Motion For Contempt And Damages Against Razor Capital;**
4. the **Declaration of Attorney Geoffrey E. Wiggs In Support Of Motion for Contempt and Damages Against Razor Capital;**
5. the **Declaration of Debtor John Flores In Support Of Motion for Contempt and Damages Against Razor Capital;**
6. all **Exhibits** attached hereto; and
7. such further evidence and oral argument as may be presented to the Court at the hearing.

This matter is governed by Bankruptcy Local Rule 9014-1 and Bankruptcy Rules of Procedure 9014, 9011, and 9020. Any opposition to this motion must be submitted at least 14 days prior to the scheduled hearing. Any reply to said opposition must be submitted at least 7 days

Any party wishing to respond to Debtor's Motion should appear personally or through counsel at the hearing. Failure to do so could result in the Court entering the requested relief by default.

**LAW OFFICES OF GEOFFREY E. WIGGS**

**DATED: August 5, 2015**

/s/ Geoffrey E. Wiggs  
GEOFFREY E. WIGGS  
Attorney for John Flores and Gina Flores